

# **EXHIBIT 18**

1 - EVREN ERYUREK -

2  
3 IN THE UNITED STATES DISTRICT COURT  
4 FOR THE SOUTHERN DISTRICT OF NEW YORK  
----- X  
5 ULKU ROWE,

6 Plaintiff,

7 Case No.  
8 19 Civ. 08655 (LGS) (GWG)

9 v.

10 GOOGLE LLC

11 Defendant.  
----- X

12 DATE: December 3, 2020  
13 TIME: 11:37 a.m.

14 VIDEOTAPED VIDEOCONFERENCE DEPOSITION  
15 OF EVREN ERYUREK, held via Zoom, pursuant to  
16 Notice, before Hope Menaker, a Shorthand Reporter  
17 and Notary Public of the State of New York.  
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2 initiatives?

3 MR. GAGE: Objection.

4 A. Yes.

5 Q. Does the PM role involve  
6 corroborating across functional and product area  
7 boundaries?

8 MR. GAGE: Objection.

9 A. Yes.

10 Q. Does the PM role involve working with  
11 broader Google engineering and research teams?

12 MR. GAGE: Objection.

13 A. Yes.

14 Q. In what ways is the PM role similar  
15 to the role that you were performing in OCTO?

16 A. Customer sponsorship evangelization,  
17 working with other teams and so forth, but nothing  
18 to do with the -- how we build a product, how we  
19 define a strategy, how we execute that strategy.

20 Q. And so the next question is: How is  
21 the PM role different from the role you were  
22 performing in OCTO?

23 A. We are responsible for defining  
24 long-term roadmaps, executing them incrementally  
25 on quarterly, whatever short term, and the

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2 understanding where the trends are, market trends  
3 are, and bringing it back to what our products and  
4 platforms need to be doing.

5 And another responsibility, we have  
6 to make sure that our revenue mark targets and so  
7 forth are projected accordingly and we deliver on  
8 our expected numbers.

9 Q. With respect to your role in PM, do  
10 you understand that you're evaluated against a  
11 leveling guideline?

12 A. Yes.

13 Q. And those engineering leveling  
14 guidelines that we looked at before, are those  
15 also relevant to the PM role?

16 A. Yes.

17 MS. GREENE: Okay, I'm just about  
18 done. What I want to do is take a short  
19 break and then we'll come back and finish up.

20 THE WITNESS: So what -- how long do  
21 we need?

22 MS. GREENE: Let's take ten minutes.

23 MR. GAGE: Okay, we'll come back ten  
24 minutes after the hour.

25 THE WITNESS: All right.